

Robert J. Gunther, Jr. (NY SBN: 1967652)  
[robert.gunther@wilmerhale.com](mailto:robert.gunther@wilmerhale.com)  
 Christopher R. Noyes (*pro hac vice*)  
[christopher.noyes@wilmerhale.com](mailto:christopher.noyes@wilmerhale.com)  
 Omar Khan (*pro hac vice*)  
[omar.khan@wilmerhale.com](mailto:omar.khan@wilmerhale.com)  
 WILMER CUTLER PICKERING HALE  
 AND DORR LLP  
 7 World Trade Center  
 250 Greenwich Street  
 New York, NY 10007  
 Telephone: 212-230-8800  
 Facsimile: 212-230-8888

Robert M. Galvin (State Bar No. 171508)  
[robert.galvin@wilmerhale.com](mailto:robert.galvin@wilmerhale.com)  
 WILMER CUTLER PICKERING HALE  
 AND DORR LLP  
 950 Page Mill Road  
 Palo Alto, CA 94304  
 Telephone: 650-858-6000  
 Facsimile: 650-858-6100

Sarah B. Petty (*pro hac vice*)  
[sarah.petty@wilmerhale.com](mailto:sarah.petty@wilmerhale.com)  
 WILMER CUTLER PICKERING HALE  
 AND DORR LLP  
 60 State Street  
 Boston, MA 02109  
 Telephone: 617-526-6000  
 Facsimile: 617-526-5000

Nora Q.E. Passamaneck (*pro hac vice*)  
[nora.passamaneck@wilmerhale.com](mailto:nora.passamaneck@wilmerhale.com)  
 WILMER CUTLER PICKERING HALE  
 AND DORR LLP  
 1225 17<sup>th</sup> Street, Suite 2600  
 Denver, CO 80202  
 Telephone: 720-274-3135  
 Facsimile: 720-274-3133

*Counsel for Defendants Roger Jinteh Arrigo  
 Chen and Genia Technologies, Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

THE REGENTS OF THE UNIVERSITY OF  
 CALIFORNIA, a California corporation,

Plaintiff,

v.

ROGER JINTEH ARRIGO CHEN, an individual;  
 GENIA TECHNOLOGIES, INC., a Delaware  
 corporation; and DOES 1-25,

Defendants.

Case No. 3:16-cv-07396-EMC

**DECLARATION OF CHRISTOPHER  
 R. NOYES IN SUPPORT OF  
 DEFENDANTS' MOTION TO JOIN  
 OXFORD NANOPORE  
 TECHNOLOGIES, INC.**

Presiding: Hon. Edward M. Chen  
 Date: June 21, 2018  
 Time: 1:30 PM  
 Courtroom: Courtroom 5, 17<sup>th</sup> Floor

**JURY TRIAL DEMANDED**

**DECLARATION**

I, Christopher R. Noyes, declare as follows:

1. I am an attorney licensed to practice in the State of New York and a partner in the law firm of Wilmer Cutler Pickering Hale and Dorr LLP. I represent Defendants Roger Jinteh Arrigo Chen and Genia Technologies, Inc. (collectively, “Defendants”), in the above-captioned matter. I am admitted *pro hac vice* in the Northern District of California in the above-captioned matter pursuant to ECF No. 80.
2. I submit this Declaration in support of Defendants’ Motion to Join Oxford Nanopore Technologies, Inc.
3. Attached hereto as Exhibit A is a true and correct copy of UCAL-00005105 – UCAL-00005177, designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by The Regents of the University of California (hereinafter, the “Plaintiff”).
4. Attached hereto as Exhibit B is a true and correct copy of UCAL-00116273 – UCAL-00116310, designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by Plaintiff.
5. Attached hereto as Exhibit C is a true and correct copy of UCAL-00116270 – UCAL-00116272, designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” by Plaintiff.
6. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent Application No. 14/302,287.
7. Attached hereto as Exhibit E is a true and correct copy of U.S. Patent Application No. 14/302,303.

- 1 8. Attached hereto as Exhibit F is a true and correct copy of an Office Action for U.S.  
2 Patent Application No. 14/302,287, retrieved from the Patent Application Information  
3 Retrieval portal (<http://portal.uspto.gov/pair/PublicPair>).  
4
- 5 9. Attached hereto as Exhibit G is a true and correct copy of an Office Action for U.S.  
6 Patent Application No. 14/302,303, retrieved from the Patent Application Information  
7 Retrieval portal (<http://portal.uspto.gov/pair/PublicPair>).  
8
- 9 10. Attached hereto as Exhibit H is a true and correct copy of the Notice of Abandonment  
10 for U.S. Patent Application No. 14/302,287, retrieved from the Patent Application  
11 Information Retrieval portal (<http://portal.uspto.gov/pair/PublicPair>).  
12
- 13 11. Attached hereto as Exhibit I is a true and correct copy of the Notice of Abandonment  
14 for U.S. Patent Application No. 14/302,303, retrieved from the Patent Application  
15 Information Retrieval portal (<http://portal.uspto.gov/pair/PublicPair>).  
16
- 17 12. Attached hereto as Exhibit J is a true and correct copy of U.S. Patent Application No.  
18 15/434,574.  
19
- 20 13. Attached hereto as Exhibit K is a true and correct copy of U.S. Patent Application No.  
21 15/491,450.  
22
- 23 14. Attached hereto as Exhibit L is true and correct copy of U.S. Patent No. 8,461,854.  
24
- 25 15. Attached hereto as Exhibit M is a true and correct copy of an email chain including a  
26 February 19, 2018 email from Paul R. Morico to Allison Trzop, which discusses  
27 documents and information designated “HIGHLY CONFIDENTIAL –  
28 ATTORNEYS’ EYES ONLY” by Plaintiff.

1 16. Attached hereto as Exhibit N is a true and correct copy of UCAL-00030429 – UCAL-  
2 00030431, designated “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY”  
3 by Plaintiff.

4 17. Attached hereto as Exhibit O is a true and correct copy of excerpts of Oxford  
5 Nanopore Technologies, Inc.’s Responses and Objections to Defendant Genia  
6 Technologies, Inc.’s Subpoena.

7  
8 18. Attached hereto as Exhibit P is a true and correct copy of excerpts of Plaintiff’s  
9 Responses and Objections to Defendants’ First Set of Production Requests.

10 19. Attached hereto as Exhibit Q is a true and correct copy of ONT\_UCSC-  
11 GENIA\_01940, designated “CONFIDENTIAL” by Oxford Nanopore Technologies,  
12 Inc. (hereinafter, “Oxford”).

13  
14 20. Attached hereto as Exhibit R is a true and correct copy of ONT\_UCSC-  
15 GENIA\_01956, designated “CONFIDENTIAL” by Oxford.

16 I declare under the pains and penalty of perjury under the laws of the United States that  
17 the foregoing is true and correct to the best of my knowledge.  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

1 Dated: April 6, 2018.

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

3 /s/ Christopher R. Noyes

4 Robert J. Gunther, Jr. (NY SBN: 1967652)

5 robert.gunther@wilmerhale.com

6 Christopher R. Noyes (*pro hac vice*)

7 christopher.noyes@wilmerhale.com

8 Omar Khan (*pro hac vice*)

9 omar.khan@wilmerhale.com

10 WILMER CUTLER PICKERING HALE  
11 AND DORR LLP

12 7 World Trade Center

13 250 Greenwich Street

14 New York, NY 10007

15 Telephone: 212-230-8800

16 Facsimile: 212-230-8888

17 Robert M. Galvin (State Bar No. 171508)

18 robert.galvin@wilmerhale.com

19 WILMER CUTLER PICKERING HALE  
20 AND DORR LLP

21 950 Page Mill Road

22 Palo Alto, CA 94304

23 Telephone: 650-858-6000

24 Facsimile: 650-858-6100

25 Sarah B. Petty (*pro hac vice*)

26 sarah.petty@wilmerhale.com

27 WILMER CUTLER PICKERING HALE  
28 AND DORR LLP

60 State Street

Boston, MA 02109

Telephone: 617-526-6000

Facsimile: 617-526-5000

Nora Q.E. Passamaneck (*pro hac vice*)

nora.passamaneck@wilmerhale.com

WILMER CUTLER PICKERING HALE  
AND DORR LLP

1225 17th Street, Suite 2600

Denver, CO 80202

Telephone: 720-274-3135

Facsimile: 720-274-3133

*Counsel for Defendants Roger Jinteh Arrigo  
Chen and Genia Technologies, Inc.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on April 6, 2018, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Civil Local Rule 5.5. Any other counsel of record will be served by electronic mail, facsimile, and/or overnight delivery.

/s/ Christopher R. Noyes

Christopher R. Noyes